

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF PUERTO RICO  
SAN JUAN DIVISION**

**IN RE:**

**CASE NO.: 17-03666-MCF13**

**LYDIA ORTIZ ORTIZ**

**CHAPTER 13**

Debtor

\_\_\_\_\_ /

**MOTION FOR CONTINUANCE OF HEARING ON RELIEF FROM STAY**

**TO THE HONORABLE COURT:**

**COME NOW** Reverse Mortgage Funding LLC, hereinafter referred to as (Movant),  
represented by the undersigned attorney who respectfully pray and state as follows:

1. Movant respectfully requests a continuance of the Hearing on the motion for relief from stay scheduled for August 25, 2020.

2. The Parties have been in conversation in order to solve this controversy. Debtor has provided evidence of insurance and Movant needs additional time to update Debtors account.

**WHEREFORE** it is respectfully requested from this Honorable Court to grant the present Motion and continue the hearing scheduled for August 25, 2020.

**NOTICE**

YOU ARE HEREBY NOTIFIED THAT YOU HAVE FOURTEEN (14) DAYS FROM THE DATE OF THIS NOTICE TO FILE AN OPPOSITION TO THE FOREGOING MOTION AND TO REQUEST A HEARING. IF NO OPPOSITION IS FILED WITHIN THE PRESCRIBED PERIOD OF TIME, THE MOTION WILL BE DEEMED UNOPPOSED AND MAY BE GRANTED WITHOUT FURTHER HEARING UNLESS(1) THE REQUESTED RELIEF IS FORBIDDEN BY LAW; (2) THE REQUESTED RELIEF IS AGAINST PUBLIC POLICY; OR (3) IN THE OPINION OF THE COURT, THE INEREST OF JUSTICE REQUIRES OTHERWISE. IF A TIMELY

OPPOSITION IS FILED, THE COURT WILL SCHEDULE A HEARING AS A CONTESTED MATTER.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this day I electronically filed this document with the Clerk of the Court using the CM/ECF system which will automatically send notification of such filing to all CM/ECF participants.

Robertson, Anschutz & Schneid, P.L.  
Attorney for Secured Creditor  
6409 Congress Ave., Suite 100  
Boca Raton, FL 33487  
Telephone: 561-241-6901  
Facsimile: 561-997-6909

By: /s/ Francisco J. Cardona  
Francisco J. Cardona, Esquire  
Puerto Rico Bar Number 230309  
Email: fcardona@rascrane.com